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7 UNITED STATES DISTRICT COURT
8 DISTRICT OF NEVADA

9 UNITED STATES OF AMERICA,

10 Plaintiff,

11 v.

12 MICHAEL MOE,

13 Defendant.

14 ANGELO LITTLEFORD,

15 Petitioner.

2:20-CR-230-KJD-DJA

**Stipulation for Entry of Order of
Forfeiture as to Aaron Littleford**

16 The United States of America and Angelo Littleford, agree as follows:

17 1. The government filed a One-Count Criminal Indictment against Michael Moe
18 for a violation of 18 U.S.C. § 922(g)(1). Criminal Indictment, ECF No. 1.

19 2. Michael Moe pled guilty to Count One of the One-Count Criminal
20 Indictment charging him with felon in possession of a firearm in violation of 18 U.S.C. §
21 922(g)(1), and agreed to the forfeiture of property set forth in the Plea Agreement and the
22 Forfeiture Allegation of the Criminal Indictment. Criminal Indictment, ECF No. 1; Change
23 of Plea, ECF No. 35; Plea Agreement, ECF No. 37.

24 3. Angelo Littleford reported the property stolen in 2020 and the United States
25 became aware of the stolen-property report made by Angelo Littleford.

26 4. Angelo Littleford affirms that the property was stolen, that he was the owner
27 of the property at the time of its theft, and that he has not been compensated for its value by
28 any insurer or third party.

1 5. Angelo Littleford knowingly and voluntarily agrees to the abandonment, the
2 civil administrative forfeiture, the civil judicial forfeiture, or the criminal forfeiture of the
3 following property: a Glock 22 .40 caliber handgun bearing serial number BEKU549
4 (property).

5 6. Angelo Littleford knowingly and voluntarily agrees to abandon or to forfeit
6 the property to the United States.

7 7. Angelo Littleford knowingly and voluntarily agrees to relinquish all
8 possessory rights, ownership rights, and all rights, titles, and interests in the property.

9 8. Angelo Littleford knowingly and voluntarily agrees to waive their right to any
10 abandonment proceedings, any civil administrative forfeiture proceedings, any civil judicial
11 forfeiture proceedings, or any criminal forfeiture proceedings (all of which constitutes
12 proceedings) of the property.

13 9. Angelo Littleford knowingly and voluntarily agrees to waive service of
14 process of any and all documents filed in this action or any proceedings concerning the
15 property.

16 10. Angelo Littleford knowingly and voluntarily agrees to waive any further
17 notice to him, his agents, or his attorneys regarding the forfeiture and disposition of the
18 property.

19 11. Angelo Littleford knowingly and voluntarily agrees not to file any claim,
20 answer, petition, or other documents in any proceedings concerning the property.

21 12. Angelo Littleford knowingly and voluntarily agrees to withdraw any claims,
22 answers, counterclaims, petitions, or other documents he filed in any proceedings
23 concerning the property.

24 13. Angelo Littleford knowingly and voluntarily agrees to waive the statute of
25 limitations, the CAFRA requirements, Fed. R. Crim. P. 7, 11, and 32.2, the constitutional
26 requirements, and the constitutional due process requirements of any abandonment
27 proceedings or any forfeiture proceedings concerning the property.

28 / / /

1 14. Angelo Littleford knowingly and voluntarily agrees to waive his right to a
2 hearing on the forfeiture of the property.

3 15. Angelo Littleford knowingly and voluntarily agrees to waive (a) all
4 constitutional, legal, and equitable defenses and claims to, (b) any constitutional or statutory
5 double jeopardy defenses and claims concerning, and (c) any defenses and claims under the
6 Eighth Amendment to the United States Constitution, including, but not limited to, any
7 claim or defense of excessive fines or cruel and unusual punishments in any proceedings
8 concerning the property.

9 16. Angelo Littleford knowingly and voluntarily agrees to the entry of an Order
10 of Forfeiture of the property to the United States.

11 17. Angelo Littleford knowingly and voluntarily agrees to the conditions set
12 forth in this Stipulation for Entry of Order of Forfeiture as to Angelo Littleford and Order
13 (Stipulation).

14 18. Angelo Littleford knowingly and voluntarily agrees to hold harmless the
15 United States, the United States Department of Justice, the United States Attorney's Office
16 for the District of Nevada, the United States Department of Homeland Security, the United
17 States Bureau of Alcohol, Tobacco, Firearms and Explosives, their agencies, their agents,
18 and their employees from any claim made by him or any third party arising from the facts
19 and circumstances of this case.

20 19. Angelo Littleford knowingly and voluntarily releases and forever discharges
21 the United States, the United States Department of Justice, the United States Attorney's
22 Office for the District of Nevada, the United States Department of Homeland Security, the
23 United States Bureau of Alcohol, Tobacco, Firearms and Explosives, their agencies, their
24 agents, and their employees from any and all claims, rights, or causes of action of any kind
25 that Angelo Littleford now has or may hereafter have on account of, or in any way growing
26 out of, the seizures and the forfeitures of the property in the abandonment, the civil
27 administrative forfeitures, the civil judicial forfeitures, and the criminal forfeitures.

28 / / /

1 20. Except as expressly stated in the Stipulation, no party, officer, agent,
2 employee, representative, or attorney has made any statement or representation to any
3 other party, person, or entity regarding any fact relied upon in entering into the Stipulation,
4 and no party, officer, agent, employee, representative, or attorney relies on such statement
5 or representation in executing the Stipulation.

6 21. After the property is forfeited in the criminal case, the Final Order of
7 Forfeiture is entered, the United States District Court has signed the Stipulation concerning
8 the property, and the United States has no outstanding evidentiary needs concerning the
9 property, within a practicable time thereafter for the United States, the United States
10 knowingly and voluntarily agrees to transfer the Glock 22 .40 caliber handgun bearing serial
11 number BEKU549 to Angelo Littleford.

12 22. The persons signing the Stipulation warrant and represent that they have full
13 authority to execute the Stipulation and to bind the persons and/or entities, on whose
14 behalf they are signing, to the terms of the Stipulation.

15 23. This Stipulation shall be construed and interpreted according to federal
16 forfeiture law and federal common law. The jurisdiction and the venue for any dispute
17 related to, and/or arising from, this Stipulation is the unofficial Southern Division of the
18 United States District Court for the District of Nevada, located in Las Vegas, Nevada.

19 24. Each party acknowledges and warrants that its execution of the Stipulation is
20 free and is voluntary.

21 25. The Stipulation contains the entire agreement between the parties.

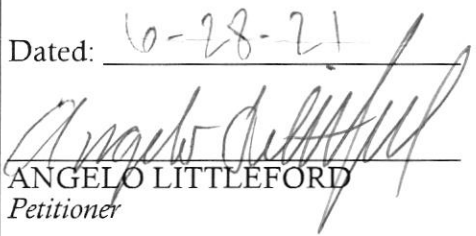
22 26. Each party shall bear his or its own attorneys' fees, expenses, interest, and
23 costs.

24 27. This Stipulation shall not be construed more strictly against one party than
25 against the other merely by virtue of the fact that it may have been prepared primarily by
26 counsel for one of the parties; it being recognized that both parties have contributed
27 substantially and materially to the preparation of this Stipulation.

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1 IT IS HEREBY CERTIFIED, pursuant to 28 U.S.C. § 2465(a)(2), that there was
2 reasonable cause for the seizure and forfeiture of the property.

3
4 Dated: 6-28-21


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6 
ANGELO LITTLEFORD
Petitioner

Dated: 07/07/21

CHRISTOPHER CHIOU
Acting United States Attorney

8 
JAMES A. BLUM
Assistant United States Attorney

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11 IT IS SO ORDERED:

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13 
14 KENT J. DAWSON
15 UNITED STATES DISTRICT JUDGE

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17 DATED: 7/13/2021
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